

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

In re:  
THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO  
RICO,  
As representative of  
THE COMMONWEALTH OF PUERTO  
RICO, et al.,  
  
Debtors.

PROMESA  
Title III

No. 17 BK 3283-LTS/Proof of claim 48181  
(Jointly Administered)

OPPOSITION TO 587 OMNIBUS OBJECTION

TO THE HONORABLE COURT:

COMES NOW, Zaida Nogue Resto (“Mrs. Nogue” or “Movant”), through the undersigned counsel, to respectfully move the Court for an Order and, in support of her motion, states as follows:

1. In the 587<sup>th</sup> Omnibus Objection, the Debtor seeks to disallow the proof of claim of reference asserting as the reason that it purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth.
2. However, in her proof of claim, Nogue did state that the basis of the claim is a pending legal action at the Bayamon Superior Court, under case # DDP2011-0553 against the Hospital Universitario of the Puerto Rican government, with no judgment.

3. We communicated this information to counsel for debtor and requested that Debtor file a motion to withdraw the request. Although counsel for Debtor replied that they would inquire into the matter, we did not receive a response.
4. We were not able to file this motion earlier because this morning the subscriber had to take his wife to the hospital due to a medical emergency and had to attend to this matter all day. We attach a photograph of the identification label that shows the date and time that the subscriber reached the hospital this morning at 4:03 am.

WHEREFORE, Movant respectfully requests that the Court grant this motion and enter an order denying the request to disallow claim 48181.

Respectfully Submitted. In San Juan, Puerto Rico, this August 14<sup>th</sup>, 2023.

We certify that this motion has been filed using the CM/ECF case filing system which will notify all parties.

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